REMARKS

Claims 1-4, 6-13, and 15-25 are all the claims presently pending in the application. Applicants have not amended the claims by the present Response. Applicants have added claims 24 and 25.

Claims 1, 3, and 8 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Nicholson et al. (U.S. Patent No. 5,999,649; hereinafter "Nicholson"). Claims 2, 4, 6, 7, 9, 10-13, and 15-23 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Nicholas in view of Sakoe (U.S. Patent No. 4,479,236).

Applicants respectfully traverse these rejections in the following discussion.

I.   THE CLAIMED INVENTION

An exemplary embodiment of the claimed invention is directed to a descriptor propagation system that includes a descriptor acceptance device that accepts a first descriptor associated with a first content granularity, a descriptor propagation device that propagates the first descriptor to a second content granularity that is finer than the first content granularity. The descriptor propagation device propagates the first descriptor without prior data regarding the first descriptor at the second granularity.

Conventional systems and methods are not capable of allowing a user to annotate content at any granularity that is coarser than the granularity at which the annotation actually exists, where the system and method then propagates or maps the annotation to the appropriate content granularity. Thus, there has been an acute need for a system and method of developing coarse to fine descriptor propagation, particularly in the domain of multimedia content.

The present invention provides a system and method, which accepts a first descriptor associated with a first content granularity and which then is capable of propagating the first descriptor to a second content granularity that is finer than the first content granularity. In this manner, the present invention is capable of propagate a descriptor to an appropriate level of granularity (the second content granularity) that is finer than the granularity at which the descriptor was received (from the user or elsewhere).

Further, the present invention is capable of propagating the descriptor without prior data regarding the descriptor at the second granularity.

II.   THE PRIOR ART REJECTIONS

A. The Nicholson Reference

The Examiner alleges that Nicholson teaches the claimed invention of claims 1, 3, and 8. Applicants submit, however, that Ishikawa does not teach or suggest each and every element of the claimed invention.

The claimed invention is directed to a method (and system) of propagating (e.g., assigning) descriptors (e.g., annotations) to an image (e.g., see claims 24 and 25). The method (and system) allows a user to assign descriptors (e.g., 302, 304, 306, and 308; Applicants submit that exemplary reference numbers are merely provided for the aid of the Examiner and are not meant to limit the scope of the claimed invention in any manner) to a video image (e.g., 300) (e.g., see Application at Figures 3-5), as recited in exemplary dependent claims 24 and 25.

In stark contrast to the claimed invention, Nicholson does not teach or suggest propagating any descriptor at all.

Rather, Nicholson merely discloses a method of generating possible character sequences (e.g., words) determined by component character labels and then assigning a confidence level to the possible character sequences (see Nicholson at column 12, lines 43-46).

Nicholson does <u>not</u> teach or suggest propagating any descriptor at all, let alone propagating <u>any descriptor to another content granularity without prior data regarding that descriptor at the second content granularity</u>.

The Examiner alleges that the character hierarchy is analogous to the claimed first content granularity and the word hierarchy is analogous to the claimed second content granularity. The Examiner, however, is clearly incorrect.

Indeed, even if one were to consider a character to be a first granularity and a word to be a second granularity, Nicholson would still fail to teach or suggest <u>a descriptor propagation device that propagates the first descriptor to a second content granularity</u> **that is finer than** <u>the first content granularity</u>, as recited in the claimed invention.

That is, Nicholson starts with a character and then combines the characters to obtain a word level confidence (see Nicholson at column 12, lines 43-61). Accordingly, the alleged first descriptor (the character) is assigned to the alleged second content granularity (the word level) that is **coarser than** the alleged first content granularity (the character level).

Accordingly, Nicholson does <u>not</u> teach or suggest "*a descriptor propagation device that propagates the first descriptor to a second content granularity that is finer than the first content granularity, and wherein the descriptor propagation device propagates the first descriptor without prior data regarding the first descriptor at the second granularity*", as recited in claim 1, and similarly recited in claims 4, 8, 10, 12, 16-17 and 20-23.

Therefore, Applicants respectfully request the Examiner to reconsider and withdraw

this rejection.

B. The Sakoe Reference

The Examiner alleges that one of ordinary skill in the art would have combined

Sakoe with Nicholson to teach the claimed invention of claims 2, 4, 6, 7, 9, 10-13, and 15-23.

Applicants submit, however, that, even if combined, the alleged combination of references

does not teach or suggest each and every feature of the claimed invention.

That is, Applicants submit that claims 2, 4, 6, 7, 9, 10-13, and 15-23 are allowable at

least based on similar reasons as those set forth above, in section A, with respect to claims 1,

3, and 8.

Therefore, Applicants respectfully request the Examiner to reconsider and withdraw

this rejection.

III. NEW CLAIMS

Applicants have added new claims 24 and 25 to claim additional features of the

invention and to vary the protection of the claimed invention further. These claims are

independently patentable because of the novel and nonobvious features recited therein.

Applicants submit that new claims are patentable over the cited prior art references at

least for analogous reasons to those set forth above with respect to claims 1-4, 6-13, and 15-
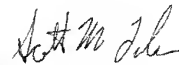
23.

IV. FORMAL MATTERS AND CONCLUSION

In view of the foregoing amendments and remarks, Applicants respectfully submit that claims 1-4, 6-13, and 15-25, all the claims presently pending in the Application, are patentably distinct over the prior art of record and are in condition for allowance. Applicants respectfully request the Examiner to pass the above application to issue at the earliest possible time.

Should the Examiner find the Application to be other than in condition for allowance, Applicants respectfully request the Examiner to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a telephonic or personal interview.

The undersigned authorizes the Examiner to charge any deficiency in fees or to credit any overpayment in fees to Assignee's Deposit Account No. 50-0510.

Respectfully Submitted,

Date: __May 20, 2008___

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